IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

limited liability company,)
Plaintiff,)
v.)
(1) PAUL A. ROMANS;)
(2) RITHA B. ROMANS;) Case No. 16-cv-72-CVE-PJC
(3) ANITA LEHNUS;)
(4) CHRISTINE TABOR; and)
(5) OCCUPANT(S) OF 39009 LABOSKEY ROAD, WISTER, OK 74966, if any,)))
Defendants.)

MOTION FOR ENTRY OF DEFAULT BY THE CLERK

Plaintiff RREF CB SBL-AZ, LLC ("RREF") requests that the Clerk of this Court enter default against Defendants Paul A. Romans, Ritha B. Romans, Anita Lehnus, and Christine Tabor (collectively, "Defendants").

- 1. As shown by the Returns of Service filed February 29, 2016 (Dkt. Nos. 8 & 9), Paul A. Romans and Ritha B. Romans were served with the Summons and Complaint on February 15, 2016. As shown by the Return of Service filed April 7, 2016 (Dkt. No. 15), Anita Lehnus was served with the Summons and Complaint on February 9, 2016.
- 2. Paul A. Romans, Ritha B. Romans, and Anita Lehnus have since appeared pro se and moved to extend the deadline for them to answer. *See* Dkt. Nos. 10, 12, & 13. This Court granted these unopposed motions for extension of time to answer by Minute Orders dated March 1, 2016 (Dkt. No. 11) and March 2, 2016 (Dkt. No. 14), and extended the answer deadline for Paul A. Romans, Ritha B. Romans, and Anita Lehnus to April 6, 2016. However, Paul A.

Romans, Ritha B. Romans, and Anita Lehnus have failed to answer or otherwise plead by the April 6, 2016 deadline.

- 3. As shown by the Return of Service filed April 7, 2016 (Dkt. No. 16), Christine Tabor was served with the Summons and Complaint on February 27, 2016. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Christine Tabor was required to serve her answer no later than March 21, 2016, but has failed to do so.
- 4. Further, as shown by the Affidavit for Entry of Default atta ched hereto as Exhibit 1, the Defendants are not infants, incompetent persons, or in military service. Accordingly, pursuant to Fed. R. Civ. P. 55(a) and LCvR55.1(a), the Clerk must enter default, and RREF hereby requests that such default be entered.

DATED April 8, 2016.

Respectfully submitted,

s/Lysbeth L. George

Judy Hamilton Morse, OBA #6450 Lysbeth L. George, OBA #30562 Andrew E. Henry, OBA #32009 -Of the Firm-CROWE & DUNLEVY, PC A Professional Corporation Braniff Building 324 N. Robinson Ave. Suite 100 Oklahoma City, OK 73102-8273 (405) 235-7700 (405) 239-6651 (Facsimile) judy.morse@crowedunlevy.com lysbeth.george@crowedunlevy.com andrew.henry@crowedunlevy.com

ATTORNEYS FOR PLAINTIFF RREF CB SBL-AZ, LLC

CERTIFICATE OF SERVICE

☐ I hereby certify that on this 8th day of April, 2016, I electronically transmitted the attached document to the Court Clerk using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):		
n/a		
☑ I hereby certify that on this 8th day of April, 2016, I served the same document by:		
☑ U.S. Postal Service ☐ Couri	er Service	☐ Email
	gistered participants of the ECF syste	
Paul A. Romans 8243 S. Florence Ave. Tulsa, OK 74137 Ritha B. Romans 8243 S. Florence Ave. Tulsa, OK 74137 Anita Lehnus 3304 W. Mayo PL Benson, AZ 85602		
Christine Tabor 2514 E. 88th St., Apt. 5 Tulsa, OK 74137		
s/ Lysbeth L. George		
	5, Ljoccai L. George	